

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

BOMBARDIER INC.,
Plaintiffs,

v.

mitsubishi aircraft corporation,
mitsubishi aircraft corporation
america inc., aerospace testing
engineering & certification inc.,
michel korwin-szymanowski,
laurus basson, marc-antoine
delarche, cindy dornéval, keith
ayre, and john and/or jane does 1-
88,

Defendants.

No. 2:18-cv-1543

[PROPOSED] ORDER
GRANTING MOTION FOR
PRELIMINARY INJUNCTION

This matter having come before the Court on the motion of Plaintiff Bombardier Inc. (Plaintiff or Bombardier) for Preliminary Injunction and the Court being fully advised, IT IS HEREBY ORDERED that Plaintiff's Motion for Preliminary Injunction is GRANTED.

Defendants Mitsubishi Aircraft Corporation America, Inc. ("MITAC America"), Aerospace Testing Engineering & Certification Inc. ("AeroTEC"), Laurus Basson, Marc-Antoine Delarche, and Cindy Dornéval are hereby immediately enjoined from the following:

- 1) Using, accessing, imitating, copying, disclosing, or making available to any person or entity the following Bombardier confidential and proprietary documents, and/or any information or data contained therein:

- a. TCCA Skew Detection Presentation- Updated with latest Systems and Structure Limits 16-02-01.pptx;
 - b. 2016-03-03 TCCA Skew Detection Presentation-JAN 28 FINAL.pptx.
 - c. RAA-BA503-412 Reduction of Temperature, Airspeed, Altitude and Mach Number Errors.pdf;
 - d. RAA-BA503-414
Lag_Effects_in_the_Production_and_Experimental_Pitot-Static_Systems.pdf;
 - e. RAA-BA503-418 Data Reduction of Ground Position Errors.pdf;
 - f. RAA-BA500-412 Rev A - Reduction of Temperature, Airspeed, Altitude and Mach Number Errors.pdf;
 - g. RAA-BA500-414-RevA-
Lag_Effects_in_the_Production_and_Experimental_Pitot-Static_Systems.pdf;
 - h. FTP PROD CSeries Rev 5.0 – 17 November 2016.docx;
 - i. FTP PROD CSERIES Rev 5.0 – 17 November 2016.pdf;
 - j. CS100_Flight_FTP_Perf_N1_target.pdf;
 - k. CS300_Flight_FTP_Perf_N1_target.pdf;
 - l. Bombardier’s Air Safety Investigation Office (ASIO) Manuals, entitled “010101” and “020301”;
 - m. BM7002.02.15.02 – Flight Performances.pdf
 - n. BM7002.06.01.01 – TSG.pdf.
- 2) Using, accessing, imitating, copying, disclosing, or making available to any person or entity any additional documents, and any information or data contained therein, that are marked as Bombardier confidential and/or proprietary and that were retained by former Bombardier employees.

1 3) Using, accessing, imitating, copying, disclosing, or making available to any person
2 or entity any information derived from the information identified in paragraphs 1
3 and/or 2, above.

4 4) Defendants Basson, Delarche, and Dornéval are further enjoined from working in
5 any manner to support the certification or commercialization efforts of the
6 Mitsubishi Regional Jet for the duration of these proceedings.

7
8 IT IS SO ORDERED.

9
10 Dated this ____ day of _____, 2018.

11
12
13 _____
14 United States District Judge

15 Presented by:

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